

RECORD OF NON-APPLICABILITY CONCERNING THE GENERAL CONFORMITY RULE (RONA)

PROPOSED ACTION

Proposed Action Name: National Memorial Cemetery of Arizona New Master Plan and Gravesite Expansion

Location: Phoenix, Arizona

Project Begin Date: 2016

Project End Date: 2076-2116

Proposed Action Summary: The U.S. Department of Veterans Affairs (VA) proposed action is to construct and expand operations on an additional 104 acres at the National Memorial Cemetery of Arizona to provide expansion for all burial options (casket, columbarium, and in-ground cremation sites). The proposed action will include supporting infrastructure, parking, irrigation, landscaping, visitor amenities, signage, as well as improvements to existing facilities at the National Memorial Cemetery of Arizona (NMCA), located in the City of Phoenix, Maricopa County, Arizona. The first phase of construction in the expansion area could be as large as 35 acres. Subsequent phases could vary in size but could be as large as 35 acres like the initial phase. Full buildout of the Master Plan is expected to provide burial options for the region for the next 60-100 years.

The Clean Air Act requires federal actions in air pollutant nonattainment or maintenance areas to conform to the applicable State Implementation Plan (SIP). The SIP is designed to achieve or maintain an attainment designation of air pollutants as defined by the National Ambient Air Quality Standards. The regulations governing this requirement are found in 40 Code of Federal Regulations (CFR) Part 93, also known as the General Conformity Rule (GCR), which applies to federal actions occurring in regions designated as nonattainment or areas subject to maintenance plans. The threshold (de minimis) emission rates have been established for actions with the potential to have significant air quality impacts that are not otherwise exempt. In addition, exemptions to the GCR have been established for actions that are clearly below de minimis thresholds. As specified in 40 CFR 93.153(c)(2), Conformity Determination regulations for federal actions shall not apply for "actions which would result in no emissions increase or an increase in emissions that is clearly de minimis."

Proposed Action Air Emissions

The Air Quality Control Region is in nonattainment for O₃ and PM₁₀. Therefore, since construction associated with the Proposed Action would result in the emission of these nonattainment or area criteria air pollutants, a review has been conducted for the Preferred Alternative to determine if the Proposed Action is subject to the General Conformity Rule.

A federal action is exempt from the General Conformity Rule requirements if the action's total net emissions are below the de minimis threshold or are otherwise exempt per 40 CFR 51.153. If net emissions exceed the relevant de minimis value, or if a project is regionally significant, a formal conformity determination process must be followed.

Air quality impacts would occur from combustive emissions due to the use of fossil fuel-fired construction equipment and on-road trucks and fugitive dust (PM₁₀/PM_{2.5}) emissions from earth-moving activities as well as driving vehicles on bare soils. Construction related emissions would be short-term and primarily occur within the boundaries of the NMCA site. The average annual emissions projected from construction under Preferred Alternative are shown in Table 1.

Table 1: Construction Emissions

Emissions Source	Average Annual Emissions (tons/year) ¹				
	CO	NO _x	VOC	PM ₁₀	PM _{2.5}
Construction Activities	41.6	14.4	0.13	23.2	2.5
de minimis Threshold	–	100	100	70	–
CO = carbon monoxide; NO _x = oxides of nitrogen; PM _{2.5} = fine particulate matter 2.5 micrometers or less; PM ₁₀ = respirable particulate matter 10 micrometers or less; VOC = volatile organic compounds					
Notes:					
1. Emissions modeled with the EPA NONROAD Emissions Model.					

Construction of the Proposed Action would occur in phases. The emissions depicted in Table 1 represent the worst case scenario as construction equipment used in subsequent phases would likely have newer emissions technology and the future phases would likely be smaller in size than 35 acres. Therefore, during each of the subsequent phases of cemetery expansion, the extent of emissions of criteria pollutants related to cemetery construction would be similar to or less than the amounts identified above. All construction activities would meet applicable State and federal air quality regulations and pollution control requirements to prevent exceedance of air quality standards during construction. In addition, to minimize any potential air quality effects during construction, VA would implement best management practices and agency environmental controls, including VA’s *Section 01 57 19: Temporary Environmental Controls*. These may include, but are not limited, to dust control measures and limiting idling of vehicles and equipment.

Construction-related emissions of criteria air pollutants from the Preferred Alternative would be less than de minimis thresholds. Therefore, there would be no significant construction-related impact on criteria air pollutants. Additionally, operational activities fall within the scope of projects listed in 40 CFR 93.153(c)(2) (ii), (iv), (vii), (x), and (xiii). The Proposed Action would not be regionally significant and is exempt from the GCR, as emissions are below the applicable de minimis requirements.

As analyzed, the Proposed Action would not

- 1) cause or contribute to any new violation of any standard in any area;
- 2) increase the frequency or severity of any existing violation of any standard in any area; or
- 3) delay timely attainment of any standard, required interim emission reductions, or other milestones in any area. Therefore, this action is exempt from the GCR requirement to prepare a full Conformity Determination, and a detailed analysis of emissions is not warranted.

Pursuant to Section 176 (c) of the Clean Air Act, as amended by the 1990 amendments; the GCR at 40 CFR Parts 51 and 93; the Department of Veterans Affairs determined that the Proposed Action is exempt

from conformity requirements in accordance with sections 40 CFR 93.153 (c) (2) (ii), (iv), (vii), (x), and (xiii), as the actions would result in emissions that are clearly de minimis, as outlined in 40 CFR 93.153 (c) (2). Therefore, this action is exempt from the GCR requirement to prepare a full Conformity Determination.

Date RONA Prepared: September 2015

RONA Prepared By: National Cemetery Administration

RONA Approval

Signature Date

[NAME]

Environmental Project Manager